

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CONVERSE INC.,

Plaintiff,

vs.

ALON INTERNATIONAL S.A.,

Defendant.

CASE NO. 04-CV-12591 - PBS

**ASSENTED TO MOTION BY PLAINTIFF CONVERSE INC.  
TO ADMIT THOMAS C. GOLDSTEIN *PRO HAC VICE***

Plaintiff Converse Inc., pursuant to Local Rule 83.5.3(b), hereby submits this Unopposed Motion to Admit Thomas C. Goldstein as *pro hac vice* counsel in the above-captioned matter. In support of its Motion, Converse submits the Certificate of Thomas C. Goldstein, attached hereto as Exhibit A, and Certificate of Good Standing, attached hereto as Exhibit B. In further support of this Motion, Converse states as follows:

1. Mr. Goldstein is a partner of the law firm of Akin Gum Strauss Hauer & Feld LLP, located at the Robert S. Strauss Building, 1333 New Hampshire Avenue, N.W., Washington, D.C.
2. Mr. Goldstein is an attorney licensed to practice law in District of Columbia and the State of Maryland. Mr. Goldstein has been a member in good standing of the District of Columbia Bar since 1998 and of the Maryland Bar since 1995.
3. Mr. Goldstein also is admitted to practice before the United States Supreme

Court, D.C. Circuit, Federal Circuit, Third Circuit, and Eleventh Circuit.

4. Mr. Goldstein certifies that he is a member in good standing in every jurisdiction where he has been admitted to practice. Mr. Goldstein further certifies that no disciplinary proceedings are pending against him as member of the bar in any jurisdiction.

5. Mr. Goldstein also certifies that he is familiar with and shall be governed by the local rules of this Court.

6. On July 12, 2006, counsel for Converse spoke with counsel for Alon, and Alon does not object to the admittance of Mr. Goldstein as *pro hac vice* counsel in this matter.

7. Michael C. Gilleran and Christine O'Connor, of the law firm Edwards Angell Plamer & Dodge, LLP, 111 Huntington Avenue, Boston, MA, are members of the Massachusetts Bar in good standing and are the Massachusetts lawyers whom will act as local counsel for Plaintiff in this action.

WHEREFORE, Plaintiff respectfully requests that Thomas C. Goldstein of the law firm Akin Gump Strauss Hauer & Feld LLP be admitted to appear *pro hac vice* before this Honorable Court in this action.

Dated: July 27, 2006

Respectfully submitted,  
**CONVERSE INC.**  
By its Attorneys,  
/s/ Christine M. O'Connor  
Michael C. Gilleran (BBO# 192210)  
Christine O'Connor (BBO #647535)  
EDWARDS ANGELL PALMER &  
DODGE, LLP  
111 Huntington Avenue  
Boston, MA 02119  
617-239-0100

**Certification Pursuant to Local Rule 7.1(A)(2)**

Counsel for Converse hereby certifies that on July 28, 2006, Michael C. Gilleran spoke with Richard A. Johnston, counsel for Alon and Mr. Johnston assented to this motion.

**Certificate of Service**

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

\_\_\_\_\_/s/ Christine M. O'Connor\_\_\_\_\_

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CONVERSE INC.,	)	CASE NO. 04-CV-12591 - PBS
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
ALON INTERNATIONAL S.A.,	)	
	)	
Defendant.	)	
	)	
	)	

**CERTIFICATE OF THOMAS C. GOLDSTEIN IN SUPPORT OF MOTION TO  
APPEAR *PRO HAC VICE* ON BEHALF OF PLAINTIFF CONVERSE INC.**

I, Thomas C. Goldstein, certify that the following information is true and correct:

1. I am a partner of the law firm of the law firm of Akin Gum Strauss Hauer & Feld LLP, located at the Robert S. Strauss Building, 1333 New Hampshire Avenue, N.W., Washington, D.C.

2. I am a member in good standing of the Bars of District of Columbia and the State of the Maryland, the United State Supreme Court, D.C. Circuit, Federal Circuit, Third Circuit, and Eleventh Circuit.

3. I have never been denied admission to, nor have I ever been disciplined in any court of any jurisdiction.

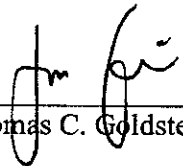
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. I respectfully request permission to appear before this Court *pro hac vice* to

represent the interests of Converse Inc. in this action.

6. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that all of the foregoing is true and correct.

July 26, 2006

  
\_\_\_\_\_  
Thomas C. Goldstein